

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-

Intervenors.

Case No. 1:18-CV-68

DEFENDANT INTERVENORS' EXHIBIT LIST

Pursuant to the parties' Agreement Regarding Discovery on Plaintiff States' Motion for Preliminary Injunction Discovery, dated June 6, 2018, Defendant Intervenors Karla Perez, *et al.* hereby disclose their list of exhibits for post-discovery briefing. Defendant Intervenors also incorporate by reference the exhibit lists disclosed by the State of New Jersey, the Federal Defendants, and the Plaintiff States. Pursuant to the parties' agreement, Defendant Intervenors' list does not include documents received during the discovery period for the preliminary injunction or the documents already attached to either Plaintiff States' motion for preliminary injunction or their complaint. Defendant Intervenors reserve the right to amend or supplement this list as needed.

| NO. | DESCRIPTION | OFFR | OBJ | DATE | |
|-----|---|------|-----|-------|-------|
| | | | | ADMIT | N/ADM |
| 1 | USCIS Letter to Hon. Charles E. Grassley, Chairman, Committee on the Judiciary, April 17, 2015 | | | | |
| 2 | USCIS Letter to Hon. Charles E. Grassley, Chairman, Committee on the Judiciary, June 29, 2016 | | | | |
| 3 | DACA Terminations Related to Criminal and Gang Activity by Fiscal Year | | | | |
| 4 | The Washington Post Article, September 7, 2017, "Did Obama allow a 'back door' to citizenship through DACA?" | | | | |
| 5 | Mem. from Jeh Charles Johnson, Secretary, USDHS, to Thomas Winkowski <i>re: Policies for the Apprehension, Detention and Removal of Undocumented Immigrants</i> , Nov. 20, 2014 | | | | |
| 6 | Mem. from John Morton, Director, USDHS, to All ICE Employees <i>re: Civil Immigration Enforcement: Priorities for the Apprehension, Detention, and Removal of Aliens</i> , March 2, 2011 | | | | |
| 7 | Mem. from John Morton, Director, USDHS, to All Field Directors, All Special Agents in Charge, All Chief Counsel <i>re Prosecutorial Discretion Consistent with Civil Immigration Enforcement Priorities of the Agency for the Apprehension, Detention and Removal of Aliens</i> , June 17, 2011 | | | | |
| 8 | Written Testimony of Stephen H. Legomsky, Jan. 28-28, 2015 | | | | |
| 9 | Fiscal Year 2016 Report to Congress, USCIS Advance Parole Documents, January. 6, 2017 | | | | |
| 10 | USDHS, National Standard Operating Procedures (SOP) Deferred Action for Childhood Arrivals (DACA) Form I-8221D and Form I-765, Apr. 4, 2013 | | | | |
| 11 | Decl. of Donald W. Neufeld, Jan. 30, 2015 | | | | |
| 12 | Decl. of Michael Hoefer, Jan. 30, 2015 | | | | |
| 13 | Mem. from Doris Meissner, Immigration and Naturalization Service Commissioner to Regional Directors, <i>Exercising Prosecutorial Discretion I</i> , Nov. 17, 2000 | | | | |
| 14 | Sam Bernsen, Immigration and Naturalization Service General Counsel, | | | | |

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|-----|---|------|-----|-------|-------|
| | | | | ADMIT | N/ADM |
| | Legal Opinion Regarding Service Exercise of Prosecutorial Discretion 1, July 15, 1976 | | | | |
| 15 | Decl. of Shoba Sivaprasad Wadhia, Dec. 15, 2017 | | | | |
| 16 | USCIS Form I-821D, Consideration of Deferred Action for Childhood Arrivals, Jan. 9, 2017 | | | | |
| 17 | USCIS, Deferred Action for Childhood Arrivals (DACA) Toolkit: Resources for Community Partners | | | | |
| 18 | Mem. From Office of Programs to Regional Directors, District Directors, Officers-in-Charge, Service Center Directors, <i>re Supplemental Guidance on Battered Alien Self-Petitioning Process and Related Issues</i> , May 6, 1997 | | | | |
| 19 | American Immigration Council, Executive Grants on Temporary Immigration Relief, 1956-Present, Oct. 2014 | | | | |
| 20 | No. 14-10049, <i>Crane v. Johnson</i> , Brief of the Federal Appellees/Cross-Appellants | | | | |
| 21 | No. 15-674, <i>United States v. Texas</i> , Brief of Former Federal Immigration and Homeland Security Officials as Amici Curiae in Support of The United States | | | | |
| 22 | Letter from Office of the Attorney General, State of CA to President Trump, July 21, 2017 | | | | |
| 23 | USCIS, Number of Form I-821D, Consideration of Deferred Action for Childhood Arrivals, by FY, Quarter, Intake, Biometrics and Case Status FY 2012-2017, (March 31) | | | | |
| 24 | FOIA Response by DHS to Shoba Sivaprasad Wadhia, March 4, 2013 | | | | |
| 25 | USCIS, Number of Form I-821D, Consideration of Deferred Action for Childhood Arrivals, by FY, Quarter, Intake, Biometrics and Case Status FY 2012-2018, (March 31, 2018) | | | | |
| 26 | Decl. of Jorge A. Aguilar, Oct. 25, 2017 | | | | |
| 27 | Decl. of David R. Anderson, Oct. 23, 2017 | | | | |
| 28 | Decl. of Ron Anderson, Oct. 25, 2017 | | | | |
| 29 | Decl. of Dr. Clarence Braddock III, Oct. 25, | | | | |

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| | 2017 | | | | |
| 30 | Decl. of Shawn Brick, Oct. 23, 2017 | | | | |
| 31 | Decl. of Sara H. Cody, M.D., Oct. 26, 2017 | | | | |
| 32 | Decl. of Alan Essig, Meg Wiehe and Misha Hill, Oct. 26, 2017 | | | | |
| 33 | Decl. of Lisa M. Gonzales, Oct. 26, 2017 | | | | |
| 34 | Decl. of Jens Hainmueller and Duncan Lawrance, Oct. 23, 2017 | | | | |
| 35 | Decl. of Ralph J. Hexter, Oct. 24, 2017 | | | | |
| 36 | Decl. of Dr. Robin Holmes-Sullivan, Oct. 24, 2017 | | | | |
| 37 | Decl. of Catherine Lucey, Oct. 27, 2017 | | | | |
| 38 | Decl. of Dr. James L. Madara, MD | | | | |
| 39 | Decl. of Kevin M. Maxwell, Ph.D., Oct. 26, 2017 | | | | |
| 40 | Decl. of Anne McLeod, Oct. 24, 2017 | | | | |
| 41 | Decl. of Nick Melvoin, Oct. 29, 2017 | | | | |
| 42 | Decl. of Fernando S. Mendoza, Oct. 29, 2017 | | | | |
| 43 | Decl. of Robert Menicocci, Oct. 27, 2017 | | | | |
| 44 | Decl. of Eloy Ortiz Oakley, Oct. 26, 2017 | | | | |
| 45 | Decl. of Deirdre O'Brien, Sept. 21, 2017 | | | | |
| 46 | Decl. of Brian Rosenberg, Oct. 23, 2017 | | | | |
| 47 | Decl. of Thomas S. Sayles, Sept. 21, 2017 | | | | |
| 48 | Decl. of Jonathan Schwartz, Oct. 30, 2017 | | | | |
| 49 | Decl. of Marcelo M. Suarez-Orozco, Oct. 27, 2017 | | | | |
| 50 | Decl. of Geoffrey H. Young, PhD, Oct. 26, 2017 | | | | |
| 51 | Decl. of Brad Wells, Oct. 31, 2017 | | | | |
| 52 | Pew Research Center, "As Growth Stalls, Unauthorized Immigrant Population Becomes More Settled, Sept. 3, 2014 | | | | |
| 53 | Mem. From Stuart Anderson, USDJ, INS, to Johnny Williams <i>re Deferred Action for Aliens with bona fide Applications for T Nonimmigrant Status</i> , May 8, 2002 | | | | |
| 54 | Mem. From William Yates, USDHS to Director, Vermont Service Center, <i>re Centralization of Interim Relief for U Nonimmigrant Status Applicants</i> , Oct. 8, 2003 | | | | |
| 55 | USCIS Press Release "USCIS Announces Interim Relief for Foreign Students | | | | |

| NO. | DESCRIPTION | OFFR | OBJ | DATE | |
|-----|--|------|-----|-------|-------|
| | | | | ADMIT | N/ADM |
| | Adversely Impacted by Hurricane Katrina”, November 25, 2005 | | | | |
| 56 | Mem. From Donald Neufeld, USCIS, to Field Leadership <i>re Guidance Regarding Surviving Spouses of Deceased U.S. Citizens and their Children</i> , Sept. 4, 2009 | | | | |
| 57 | Mem. From Donald Neufeld, USCIS, to Executive Leadership <i>re Additional Guidance Regarding Surviving Spouses of Deceased U.S. Citizens and Their Children (REVISED)</i> , December 2, 2009 | | | | |
| 58 | Open Letter from Leaders of American Industry, October 30, 2017 | | | | |
| 59 | Videotaped Deposition of James McCament, Oct. 17, 2017 | | | | |
| 60 | Videotaped Deposition of James D. Nealon Oct. 13, 2017 | | | | |

Dated: June 15, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the 15th day of June, 2018, I served a copy of this document by electronic mail to all counsel of record.

/s/ Nina Perales
Nina Perales